

Turetsky, Samantha (Law)

From: Bryan Glass <bglass@ghnylaw.com>
Sent: Tuesday, April 16, 2019 8:33 AM
To: Turetsky, Samantha (Law)
Subject: Zabar v. DOE (18 cv 6657)-discovery followup

Follow Up Flag: Follow up
Flag Status: Completed

We have reviewed your followup letter of April 8, 2019, and believe that we have fully complied with our written discovery obligations and provided the documents responsive to your requests. If you believe you need to write to the judge about alleged deficiencies that cannot be addressed during depositions, we will respond accordingly.

We are still awaiting Defendants' electronic discovery responses that you stated were to be provided by yesterday 4/15/19. When do you expect to provide them?

We can agree to depose Lynn Rosales on 4/29/19 and Manuel Urena on 5/2/19 at your 100 Church Street offices. If you prefer to come to my office for me to take these depositions, we can do the depositions at 85 Broad Street, 18th Floor.

Please confirm the deposition dates for Ms. Rosales and Mr. Urena commencing at 10 am and location, and we will send you deposition notices if you insist that they are necessary.

Thank you,

----- Forwarded message -----

From: Turetsky, Samantha (Law) <sturetsk@law.nyc.gov>
Date: Mon, Apr 15, 2019 at 5:57 PM
Subject: Zabar v. DOE (18 cv 6657)
To: Bryan Glass <bglass@ghnylaw.com>

Please see attached supplemental disclosures. I have placed a copy of the same in the mail.

Thank you,

Samantha P. Turetsky

Assistant Corporation Counsel

Labor and Employment Division

New York City Law Department

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--
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NOTE NEW ADDRESS AS OF 10/1/18

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